

CR # 03-1772-CBS

AFFIDAVIT

I, Michele Collins, having been duly sworn, hereby depose and state as follows:

Affiant's Background

1. I am a Special Agent of the United States Department of State, Diplomatic Security Service, and have been so employed since June, 2002. As a Federal law enforcement agent, I have received training and instruction in criminal investigation at the Federal Law Enforcement Training Center (FLETC), located in Glynco, Georgia. In addition, I have received specialized training and instruction through the United States Department of State, Diplomatic Security Service, including criminal investigative techniques in relation to United States passport/document frauds and other offenses against the United States. As part of my official duties, I am assigned to investigate persons who have provided or included false information in U.S. passport applications.

2. I make this affidavit in support of a criminal complaint charging John Doe, also know as Vinson Duke Robinson Mangos, Jr., with making false statements in a application for a United States passport, in violation of Title 18, United States Code, Section 1542, and fraudulent use of a Social Security Number, in violation of Title 42, United States Code, Section 408 (a) (7) (B).

3. The information set forth in this affidavit is based on information provided to me by other law enforcement agents and officers, as well as information gathered through my own investigation. It does not contain all of the information known to me and other law enforcement concerning this investigation, only that information sufficient to set out the probable cause in support of a criminal complaint and the issuance of an arrest warrant in connection with this matter.

Facts

4. On or about May 25, 2003, an individual identifying himself as Vinson Duke Robinson Mangos, Jr. submitted an application for a United States Passport at the Worcester City Hall Clerk's Office, located in Worcester, Massachusetts. A copy of the application is appended hereto as Exhibit A. The application calls for biographical information from the applicant, including but not limited to, two photographs of the applicant, an identifying document (e.g., the mother's EBT (Electronic Benefits Transfer card (#109700385865), and evidence of citizenship (e.g., a birth certificate), among other items. Based on my experience and training, I know that the United States Department of State relies upon the information set forth in such applications in connection with the issuance of United States passports. Box #21 of the application contains an affirmation above the signature line,

which reads in pertinent part, as follows: "I solemnly swear (or affirm) that the statements made on this application are true and correct and the photograph attached is a true likeness of me."

5. My investigation disclosed that the application includes, but is not limited to, the following materially false and fraudulent information:

Box #	Description	Materially false and fraudulent information
1	Name	Vinson Duke Robinson Mangos, Jr.
5	Date of Birth	09011988
6	Social Security Number	031706804
21	Applicant's Signature	"V. Mangos" /s/

6. The application shows (Box #23b.) that a Massachusetts EBT card was provided with the application as proof of the applicant's identity since the applicant was a minor. Based on my training and experience, I know that personnel who are authorized to accept U.S. Passport applications are required to demand proof of the applicant's identity. Further, the application contains Social Security Number "031706804" in Box #6.

7. On November 21, 2003, in connection with this investigation, I contacted Special Agent Jason Donnelly, of the Office of Inspector General of the Social Security Administration. Special Agent Donnelly informed me that Social

Security Number 031-70-6804 is assigned to a "Vinson Mangos, Jr." A copy Special Agent Donnelly's Report is attached hereto as Exhibit B.

8. The application shows that a birth certificate was presented as proof of citizenship (Box #24).

9. On June 30, 2003, I traveled to 186 Canterbury Street, in Worcester, Massachusetts, the address of the applicant (Box #2). At that location, Diplomatic Security Service Special Agent Nicholas Porter and I interviewed Lisa Cross and Virginia Harris, both of whom identified themselves as the legal guardians of Vinson Mangos, Jr., a juvenile. We displayed to Ms. Cross and Ms. Harris a color copy of the Form DS-11 U.S. Department of State U.S. Passport Application in the name of Vinson Duke Robinson Mangos, Jr., bearing the photograph of John Doe (Exhibit A). Both Ms. Cross and Ms. Harris told me that the individual depicted in the photograph appended to the DS-11 is not Vinson Mangos, Jr. In addition, neither Ms. Cross nor Ms. Harris could identify the individual depicted.

10. On or about June 27, 2003, I obtained a fax from Officer Joseph Petty, of the Worcester Juvenile Division, School Liaison. According to Office Petty, the fax contained a photograph of the true Vinson Duke Robinson Mangos, Jr. I have compared the fax photograph of the true Vinson Duke Robinson

Mangos, Jr. to the photograph affixed to the DS-11 and determined that they are not the same person. I have not interviewed the true Vinson Duke Robinson Mangos, Jr.

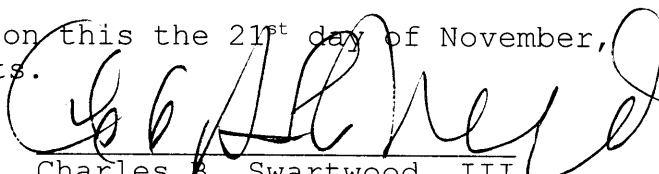
11. Based on the foregoing, there is probable cause to believe that John Doe a/k/a Vinson Duke Robinson Mangos, Jr. did, on or about May 23, 2003, willfully and knowingly make false statements in an application for a United States passport, with intent to induce or secure issuance of a passport under the authority of the United States, either for his own use or the use of another, contrary to the laws regulating the issuance of passports or the rules prescribed pursuant to such laws, in violation of Title 18, United States Code, Section 1542. In addition, based on the foregoing, there is probable cause to believe that John Doe a/k/a Vinson Duke Robinson Mangos, Jr., for the purpose of obtaining a U.S. passport in the name of Vinson Duke Robinson Mangos, Jr., with intent to deceive, falsely represented a number to be the social security account number assigned by the Commissioner of Social Security to him or to another person, when in fact such number is not assigned by the Commissioner of Social Security

to him or to such other person, in violation of Title 42, United States Code, Section 408 (a) (7) (B).



Michele Collins
Special Agent
U.S. Department of State
Diplomatic Security Service

Sworn and subscribed before me on this the 21st day of November,
at Cotuit, Massachusetts.



Charles B. Swartwood, III
United States Magistrate Judge